## ENVIRONMENTAL THRESHOLD DECISION

<table>
<thead>
<tr>
<th>Activity Location:</th>
<th>El Salvador</th>
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<tbody>
<tr>
<td>Activity Title:</td>
<td>Tropical Storm Ida Reconstruction Activity</td>
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<tr>
<td>Activity Number:</td>
<td>519-0466</td>
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<tr>
<td>Life-of-Activity Funding:</td>
<td>$25 million</td>
</tr>
<tr>
<td>Life-of-Activity:</td>
<td>01 June 2010- 30 December 30</td>
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<tr>
<td>IEE prepared by:</td>
<td>Annie G. de Valencia, Strategic Development Office, USAID/El Salvador</td>
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<tr>
<td>Reference ETDs:</td>
<td>LAC-IEE-11-21</td>
</tr>
<tr>
<td>Recommended Threshold Decision:</td>
<td>Categorical Exclusion Negative Determination with Conditions Positive Determination</td>
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<tr>
<td>Bureau Threshold Decision:</td>
<td>Concur with Recommendation</td>
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### Comments:

This Environmental Threshold Decision amends LAC-IEE-11-21 to extend the life of activity from September 30, 2014 to December 30, 2014. In addition, based on preliminary assessments, the scope of the activity has been narrowed down to a total of up to 20 schools, 14 health clinics and 6 bridges. Other activity components remain the same. The threshold decisions approved under LAC-IEE-ETD-11-21 for “Tropical Storm Ida Reconstruction Activity” remain unchanged.

A Categorical Exclusion is issued to the Tropical Storm Ida Reconstruction Activity for any analyses and studies associated with the project, as well as any training programs, such as training on the use of new equipment and proper maintenance. Pursuant to 216.2 (c) (2):
(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.);

(ii) Controlled experimentation exclusively for the purpose of research and field evaluation which are confined to small areas and carefully monitored;

(iii) Analyses, studies, academic or research workshops and meetings;

A Negative Determination with Conditions is issued to the Tropical Storm Ida Reconstruction Activity for small-scale construction activities and supply of equipment. The condition requires that:

- The implementing partner prepares an Environmental Mitigation Plan (EMP), see attached, describing how it will, in specific terms, implement mitigation measures that will reduce or eliminate potential adverse impacts on the environment.

- The EMP shall include a plan to monitor the implementation of mitigation measures and their effectiveness.

- This EMP will be integrated into the initial and subsequent work plans, making any necessary adjustments to activity implementation in order to minimize adverse impacts to the environment.

- Language reflecting this condition will be included in all agreements and contracts for implementing these components. Guidance on preparation of the EMP will be provided to the contractor as part of the Request for Proposals.

- An EMP, developed by the implementing partner and approved by the Mission Environmental Officer (MEO), will be prepared prior to implementation of any construction activities. The plan will include details regarding mitigation, monitoring, and evaluation of the activities. The implementing partner shall use the “Guidelines for Implementing Partners on the USAID LAC Environmental Mitigation Plan & Report.” This document will be provided to potential implementing partners at the time of solicitation. This Guidelines document was included to the original IEE as Annex 1. Reference material for completing this plan may be found in the “Environmental Guidelines for Development Activities in Latin America and the Caribbean,” specifically chapters 2 and 5.

http://www.usaid.gov/locations/latin_america_caribbean/environment/docs/epiq/epiq.htm

A Positive Determination is issued for large-scale construction activities. Large-scale construction activities causing significant environmental impacts will require an approved Environmental Assessment before they can be implemented.
Responsibilities

- Each activity manager or Contracting/Agreement Officer Technical Representative (COR/AOR) is responsible for making sure environmental conditions are met (ADS 204.3.4). In addition, COR/AORs are responsible for ensuring that appropriate environmental guidelines are followed, mitigation measures in the IEE are funded and implemented, and that adequate monitoring and evaluation protocols are in place to ensure implementation of mitigation measures.

- It is the responsibility of the Development Objective (DO) Team to ensure that environmental compliance language from the ETD is added to procurement and obligating documents, such as activity-related Strategic Objective Grant Agreements (SOAGs) and Modified Acquisition and Assistance Request Documents (MAARDs).

- The Mission Environmental Officer (MEO) will conduct spot checks to ensure that conditions in the IEE and this ETD are met. These evaluations will review whether guidelines are properly used to implement activities under this ETD in an environmentally sound and sustainable manner according to USAID and applicable U.S. Government policies and regulations.

- The implementing contractor or partner will assign a person responsible for environmental compliance and ensure that all activities conducted under this instrument comply with this ETD. Also, through its regular reporting requirements, a section on environmental compliance (e.g. mitigation monitoring results) will be included.

Amendments

- Amendments to Initial Environmental Examinations (IEE) shall be submitted for LAC Bureau Environmental Officer (BEO) approval for any activities not specifically covered in the IEE, which include:
  - Funding level increase beyond ETD amount,
  - Time period extension beyond ETD dates (even for no cost extension), or
  - A change in the scope of work, such as the use of pesticides or activities subject to Foreign Assistance Act sections 118 and 119 (e.g. procurement of logging equipment), among others.

- Amendments to IEEs include Environmental Assessments (EA or PEA) and approval of these documents by the LAC BEO could require an annual evaluation for environmental compliance.

Victor H. Bullen  Date: 10/15/2012
Victor H. Bullen
Bureau Environmental Officer
Attachments:
- Initial Environmental Examination Amendment

P:\LAC.RSD.PUB\ENV\Reg 216\IEE\IEE13\LAC-IEE-13-01 ETD (ES - Tropical Storm Ida Reconstruction, amend LAC-IEE-11-21).docx
Activity Location: El Salvador
Activity Title: Tropical Storm Ida Reconstruction Activity
Activity Number: 519-0466
Life-of-Activity Funding: $25 million
Life-of-Activity: June 2010 – December 30, 2014
Reference Threshold Decision: LAC-IEE-ETD-11-21
IEE prepared by: Annie G. de Valencia, Strategic Development Office, USAID/EI Salvador
Date Prepared: October 1, 2012

Recommended Threshold Decision: Categorical Exclusion
Negative Determination with Conditions
Positive Determination

Allen F. Vargas, Acting Mission Director

Date
1. BACKGROUND AND ACTIVITY DESCRIPTION

1.1 Purpose and Scope of IEE
The purpose of this Initial Environmental Examination (IEE) is to amend LAC-IEE-ETD-11-21 to extend the life of activity from September 30, 2014 to December 30, 2014. In addition, the scope of the Activity has been reviewed based on preliminary assessments, carried out by the implementing partner, which narrows down the number of facilities to be reconstructed. The revised number of facilities is: a total of up to 20 schools, 14 health clinics and 6 bridges. Other activity components remain the same. The threshold decisions approved under LAC-IEE-ETD-11-21 for “Tropical Storm Ida Reconstruction Activity” remain unchanged.

1.2 Background
On November 8-9, 2009, mudslides and flooding associated with Tropical Storm Ida resulted in extensive loss of life and property in El Salvador. Damages included at least 200 dead, 15,000 displaced persons, and destruction of critical infrastructure such as bridges, roads, homes, schools, health clinics, and water and sanitation facilities. The majority of the damage occurred in five of El Salvador’s 14 departments: San Salvador, La Paz, Cuscatlán, San Vicente, and La Libertad. To a lesser extent, the departments of Usulután and Cabañas also experienced damage. On December 4, 2009, the Economic Commission of Latin America and the Caribbean (ECLAC), with the support of the Government of El Salvador (GOES), published a Damage Assessment Report that estimated 125,000 Salvadorans were directly or indirectly affected. The report concluded that $343 million would be required for the rehabilitation and reconstruction of the affected areas, with more than half of that amount ($181 million) needed for the reconstruction of roadways and bridges. The Ministries of Education, Health, and Housing detailed the damages suffered by key social infrastructure like schools, health clinics, and housing. Furthermore, with assistance from the U.S. Army Corps of Engineers (USACE), the Ministry of Public Works (MOP) surveyed road, bridge, and secondary road damages and detailed needed repairs.

Although the GOES took life-saving measures through its civilian and military entities immediately following the disaster, longer-term reconstruction efforts require significant additional resources. With FY 2010 supplemental funds, the U.S. Agency for International Development (USAID) will support the recovery of a valued ally from the lingering effects of Tropical Storm Ida. GOES-identified critical needs include: complete reconstruction of bridges and portions of roads; repairs to ceilings, roofs, walls and floors of schools and medical facilities; rehabilitation of essential services such as septic, sanitation, and potable water systems, repairs to electrical systems, and repairs to or rebuilding of perimeter security walls. Of those areas identified by the GOES, USAID will support reconstruction of bridges, schools and health clinics. These areas of focus are in keeping with the appropriation and reflect recent discussions with the GOES.

1.3 Description of Activity
The Tropical Storm Ida Reconstruction Activity is a principal support for the Assistance Objective (AO) “Timely Humanitarian Assistance and Crisis Response”, No. 519-024, which aims to improve the capacity of host countries to reduce vulnerabilities and respond to humanitarian emergencies. The activity will support IR 2: Humanitarian Relief and
Reconstruction. The activity will be implemented through December 30, 2014. The total estimated USAID contribution for the activity is $25,000,000. USAID assistance will address the priority needs of the GOES in the five most affected departments and support the GOES’ efforts to recover and rebuild infrastructure damaged by the Tropical Storm.

Originally, a total of approximately 102 schools, 25 clinics, and 12 bridges were identified. In December 2009, an Economic Commission of Latin America and the Caribbean (ECLAC) Damage Assessment Report indicated that 111 schools, 25 health clinics, and 47 bridges sustained moderate or severe damage or were completely destroyed. Based on a 2010 Report, the GOES provided via an Action Plan a preliminary list of projects to be financed under this Activity which included 32 schools, 14 health clinics, and 6 bridges. Further work done by the USAID hired Architecture and Engineering (A&E) firm in charge of project implementation, narrowed down the number of facilities that could be realistically built or reconstructed and adjusted cost and time estimates for each one. As a result, current estimates indicate that a total of up to 20 schools, 14 health clinics and 6 bridges could be reconstructed. School and health clinic projects will include rehabilitation of essential services, including, but not limited to, repairs to septic, sanitation, potable water and electrical systems and repairs to roofs, building walls, floors, doors, windows, and perimeter security walls. A few schools and clinics were damaged so extensively or are located in such risky locations that complete relocation/reconstruction is required. USAID may also provide essential equipment for the schools and clinics. Bridge projects will include construction of associated road approaches and other drainage structures in the affected areas, as well as all necessary assessments and mitigation measures.

1.4 Locations Affected
Locations affected are areas of El Salvador that were impacted by Hurricane Ida, with a focus on the following departments that sustained the greatest damages: San Salvador, La Paz, Cuscatlán, San Vicente, and La Libertad.

1.5 National Environmental Policies, Procedures or Regulations
El Salvador national environmental laws and policies that apply are within the 1993 Ley General del Ambiente and subsequent Reglamento General de la Ley del Medio Ambiente de El Salvador. Contractors will perform the required analyses and studies to ensure that these laws are met.

2. EVALUATION OF ENVIRONMENTAL IMPACT POTENTIAL
Analyses, studies, and trainings associated with the project have a low risk of environmental impacts.

Small-scale construction activities, such as repairs to roofs or replacement of windows, have the potential for medium risks to the environment. These activities could result in environmental impacts during and following implementation. For example, inappropriate disposal of construction materials could result in contamination of soils and aquatic resources. Inappropriate practices of workers at the site could disrupt wildlife and result in damage to vegetation. Mitigation measures are required to minimize and prevent these environmental impacts.
Large-scale construction activities include the construction of bridges and the construction of schools and clinics that are greater than 10,000 square feet or require significant land use change or modification. These activities pose the potential for high risks to the environment. An Environmental Assessment (EA) is required to fully detail the risks before these activities can begin.

An A&E firm has been contracted to implement the project. As part of their work plan, they have executed a rapid appraisal of all identified sub-projects. This activity has required numerous field site visits to schools, clinics and bridges and a more detailed analysis of potential environmental impacts.

A second stage in the process has been the undertaking of the preliminary designs of 2 bridges, 4 schools and 3 clinics. Engineering studies from these preliminary designs have served to better understand each sub-project and the potential risks that individual tasks/activities may represent to its surroundings.

Scoping statements are currently being developed by the implementing partner for both bridges and they present and evaluate alternate solutions for the Government of El Salvador’s reconstruction need. Just as well, the project has a social component that seeks to involve the community on several levels of interaction: design considerations, construction activities, security and safety, operations and maintenance. These scoping statements will serve as the basis for the required Environmental Assessments by the Positive Determination recommended under previous Threshold Decision for large-scale construction activities.

As for schools and health clinics, programmatic environmental mitigation plans (EMPs) are being prepared separately by the A&E firm to account for special infrastructure uses and needs that distinguish each type of facility. Schools are highly populated facilities with heavy pedestrian traffic, noise production and require relatively larger extensions of land. Health clinics, on the other hand, require the prevision of bio-safety measures implemented through design considerations, construction practice for health facilities, and operations and maintenance (O&M) processes.

In addition, three subprojects (one bridge, one school and one health clinic) were selected as study cases for a “Regional Environmental Training” held in June, 2012. Interesting viewpoints and recommendations that resulted from this training exercise have been seriously taken into account to complement the corresponding environmental studies for schools, health clinics and bridges.

3. RECOMMENDED THRESHOLD DECISIONS AND MITIGATION ACTIONS

The previous Threshold Decision remains valid for all interventions under this Activity.

3.1 Recommended Threshold Decision and Conditions
The USAID Environmental Procedures in 22 CFR 216.2 provide for the classification and determination of potential environmental effects of USAID funded activities and in selected
cases for the Categorical Exclusion from these requirements. Section 216.2 (c) (2) provides Categorical Exclusions for:

(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.)
(ii) Analyses, studies, academic or research workshops and meetings

A Categorical Exclusion is issued for any analyses and studies associated with the project, as well as any training programs, such as training on the use of new equipment and proper maintenance.

A Negative Determination with Conditions is issued for small-scale construction activities and supply of equipment. The condition requires that the implementing partner prepares an Environmental Mitigation Plan (EMP) describing how it will, in specific terms, implement mitigation measures that will reduce or eliminate potential adverse impacts on the environment. The EMP shall include a plan to monitor the implementation of mitigation measures and their effectiveness. This EMP will be integrated into the initial and subsequent work plans, making any necessary adjustments to activity implementation in order to minimize adverse impacts to the environment. Language reflecting this condition will be included in all agreements and contracts for implementing these components. Guidance on preparation of the EMP will be provided to the contractor as part of the Request for Proposals.

A Positive Determination is issued for large-scale construction activities. Large-scale construction activities causing significant environmental impacts will require an approved Environmental Assessment before they can be implemented.

3.2 Mitigation, Monitoring, and Evaluation
An EMP, developed by the implementing partner and approved by the Mission Environmental Officer (MEO), will be prepared prior to implementation of any construction activities. The plan will include details regarding mitigation, monitoring, and evaluation of the activities. The implementing partner shall use the “Guidelines for Implementing Partners on the USAID LAC Environmental Mitigation Plan & Report.” This document will be provided to potential implementing partners at the time of solicitation. This Guidelines document was included to the original IEE as Annex 1. Reference material for completing this plan may be found in the “Environmental Guidelines for Development Activities in Latin America and the Caribbean,” specifically chapters 2 and 5.

IEE Amendment No. 1 of Threshold Decision No. LAC-IEE-ETD-11-21 for the “Tropical Storm Ida Reconstruction Activity”.

Drafted by:
AValencia, SDO Date: 
AMaceda, EG Date: 

Cleared by:
NVelásquez-Castro, A/SDO Date: 
MRodríguez, MEO Date: 
PSchmidtke, REA Date: 
TMcAndrews, A/EG Date: 
LRivera, A/DDIR Date: 

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IEE Amendment No. 1 of Threshold Decision No. LAC-IEE-ETD-11-21 for the “Tropical Storm Ida Reconstruction Activity”.

Drafted by: AValencia, SDO Date: 10/01/2012 
AMaceda, EG Date: Oct 1, 2012

Cleared by: NVelásquez-Castro, A/SDO Date: Oct 1, 2012 
MRodríguez, MEO Date: 9-10-12 
PSchmidtke, REA Date: 10-03-12 
TMcAndrews, A/EG Date: 10-03-12 
LRivera, A/DDIR Date: 10-03-12

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with 35 comments 10-02-2012
GUIDELINES FOR IMPLEMENTING PARTNERS ON THE USAID LAC ENVIRONMENTAL MITIGATION PLAN (EMP)

October 28th, 2009

A. Background

All projects funded by USAID must conform to US environmental regulations (22 CFR 216) requiring evaluation to ensure that no adverse environmental impacts result from the projects, that cannot be mitigated. All USAID programs funded through USAID LAC Missions fall under an Environmental Threshold Decision (ETD) designated at the Strategic Objective level. The Environmental Mitigation Plan (EMP), so described by these guidelines, ensures programmatic compliance with 22 CFR 216 by meeting the conditions specified in the applicable ETDS authorized by the USAID Latin America and the Caribbean (LAC) Bureau Environmental Officer (BEO).

Programs implemented by USAID LAC Mission implementing partners (IPs) include a range of discrete-activities under various awards that will likely have a risk for adverse environmental impact. Illustrative discrete activities include building refurbishment and medical waste management. This EMP procedure will provide for both the screening for environmental risk, preparation of a mitigation plan and reporting on monitoring of these mitigation measures, which require that appropriate consideration is given to gender as a social impact factor in the development of a mitigation plan and subsequent measures.

The EMP initially categorizes projects into three types: No Risk, Medium Risk and High Risk. Those with No Risk can continue without further review. Those with High Risk must be reconsidered for the need of an Environmental Assessment. The EMP deals with those projects at Medium Risk (see Figure 2).

All grantees/contractors will be required to fill out an Environmental Mitigation Plan per project type that includes:
1. The Environmental Screening Form,
2. The Identification of Mitigation Plan, and
3. The Environmental Monitoring and Tracking Table.

Program managers/COTRs and Chiefs of Parties can work with the USAID Mission Environment Officer (MEO) to ensure impacts are sufficiently identified and mitigation actions are agreed upon, including clear guidance on the procedures for gender integration where fitting.
Figure 1: Timeline of Reporting Requirements for Environmental Mitigation

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**B. Timing of Reporting Requirements**

Once a site-specific project has been identified, an initial EMP is submitted by the applicant or contractor to the COTR/AOTR. The EMP is reviewed and must be approved by the Mission Environmental Officer and/or Regional Environmental Advisor before commencing activities. For subgrants, the grantee is required to fill out the EMP and submit it for approval to the Chief of Party (COP). The COP then submits the EMP for review and final approval to the COTR and MEO. Gender issues must be addressed in the Environmental Mitigation Plan in keeping with the Agency’s executive message on gender integration dated May 4, 2009.

A format for this initial EMP can be seen in attachment 1; it includes:

1. An initial screening process using the “Environmental Screening Form” (Appendix 1, Table 1) to assure the project is at the Medium Risk Level followed by,

2. The identification of potential impacts and related mitigation measures using the “Identification of Mitigation Plan” (Appendix 1, Table 2) for each subactivity.

3. The Environmental Monitoring and Tracking Table (Appendix 1 Table 3) that documents the necessary mitigation measures to be monitored, lists monitoring indicators, and includes who will conduct the monitoring when. Table 3 also includes a monitoring chart that documents who conducted the monitoring and the effectiveness of the mitigation measures.

At the end of each year of implementation, the EMP is resubmitted with the same information as provided initially, plus a component reflecting the status of implementation and effectiveness monitoring, of the identified mitigation measures using the “Environmental Monitoring and Tracking Table” (Appendix 1, Table 3). This table will be used for project environmental monitoring and will be submitted to the USAID Contracting Officer’s Technical Representative (COTR), formerly known
as CTO, on an annual basis along with the initial EMP as well as a narrative providing details on the mitigation process. The report should not exceed ten pages (excluding annexes).

C. Initial Environmental Mitigation Report

1. Classification of Level of Risk

Components of a program or discrete activities under an award can have varying levels of risk for environmental damage and therefore require different courses of action (Figure 2). No-risk activities, classified under "i" below, do not require the EMP as they already should have been addressed under a "categorical exclusion" determination in the original SO-level IEE and Environmental Threshold Decision or subsequent amendments. High-risk activities ("ii") will have significant environmental impacts that will require an Environmental Assessment (EA) contracted through the IP with MEO consultation to a professional environmental impact assessment organization with final approval by the LAC Bureau Environmental Officer. Such activities are not to be avoided if they meet a crucial need of the community (e.g., solid waste disposal facility, municipal-scale waste water treatment plant). Medium-risk activities ("iii") will require the IP to screen environmental impacts and plan for mitigation of adverse environmental impacts. It is to these medium-risk activities that this EMP guidance primarily applies.

Figure 2: Schematic of required action based on the level of risk of a component or discrete activity under an award.

i. Discrete Activities that Do Not Require Mitigation Plans (No-Risk):

An illustrative list of no-risk discrete activities where no mitigation reporting is required includes:

- Education or training*, unless it implements or leads to implementation of actions that impacts the environment (such as construction of schools or use of pesticides),
- Community awareness initiatives,
- Controlled research/demonstration projects in a small area,
- Technical studies or assistance,
- Information transfers.
If there is a risk that the actual implementation of materials learned during training could adversely impact the environment (e.g., training on agricultural techniques), the training is expected to include as part of its curriculum, an analysis of environmental impacts and planning for mitigation.

ii. Discrete Activities that Cannot be Supported (High-Risk):

Under the environmental regulations of USAID, if there is a discrete activity which is considered critical to the needs of the community that may have a significant environmental impact, such activities will require an Environmental Assessment. In the case of pesticide use a Pesticide Evaluation Report and Safer Use Action Plan (PERSUAP) will need to be prepared by the partner and approved by the USAID Latin America and the Caribbean (LAC) Bureau Environmental Officer (BEO). Such activities include but are not limited to:

- Agricultural, livestock introduction or other activities that involve forest conversion,
- Resettlement of human populations,
- Large water management systems such as dams or impoundments,
- Drainage of wetlands,
- Introduction of exotic plants or animals,
- Permanent modification of the habitat supporting an endangered species,
- Industrial level plant production or processing (this does not include community or regional plant nurseries aimed at restoring areas after fires),
- Installation of aquaculture systems in sensitive lakes, marine waters (not land-based fish ponds),
- Procurement of timber harvesting equipment, including chainsaws,
- Use of pesticides (insecticides, herbicides, acaricides, fungicides),
- Large scale construction in un-degraded land,
- Large scale new construction involving permanent living quarters and/or sanitation facilities,
- Cutting of trees over 20 cm diameter breast height, especially tropical trees, except as needed to control disease or maintain forest health.
- Construction of new roads or upgrading/maintenance of extensive road, fire break or trail systems through un-degraded forest land or natural habitats.

iii. Discrete Activities that can be Supported if Mitigation Measures are Planned and Implemented (Medium-Risk):

Many discrete activities under an agreement will fall between the two extremes mentioned above and offer some adverse environmental impact that can be mitigated with proper planning. For these activities the Implementing Partner (IP) will be responsible for completing the EMP on an annual basis.

2. Sector-Specific Environmental Screening Form

The Environmental Screening Form contains information relevant to the potential environmental impact over the life of activity to natural resource and communities, local
planning permits, and environment and health. If items in the Environmental Screening Form (Appendix 1, Table 1) from Column “A” are checked then items for monitoring and mitigation are to be specified in the “Identification of Mitigation Plan” (Appendix 1, Table 2). The Mitigation Plan simply outlines the plan of action for mitigation of planned activities. The Mission Environmental Officer is to approve these forms, with special attention to those projects with identified impacts (i.e., projects with any check marks in Column A).


D. Annual Environmental Mitigation Report

On an annual basis each implementing partner will submit an “Environmental Mitigation Report” (EMR) using the attached EMP Table 3 (Appendix I). The EMR contains information relevant to the potential environmental impact over the life of a discrete activity under an award and includes: A) a copy of the initial EMP completed during the initial project planning (reference section B above); B) the prescribed mitigation measures using the “Identification of Mitigation Plan (Appendix 1, Table 2)”; and C) synthesized data on these mitigation measures collected throughout the year and tracked in the Environmental Monitoring and Evaluation Tracking Table (Appendix I, Table 3). As it is often difficult to quantitatively measure progress of complex mitigation measures, it is necessary to include inserted digital photos (with relevant maps) to describe progress of mitigation activities.

USAID Mission requires that Implementing Partners clearly demonstrate competence in implementing discrete activities using best management practices which most often will provide the additional benefit of environmental protection. In addition, the mitigation activities should consider the critical importance of integrating gender considerations in all stages of planning, programming, implementation, and monitoring of USAID activities.

Sections of the EMP include:

1. EMP Coversheet
2. EMP Narrative (to be filled out with project specific information)
3. Annexes:
   a. Environmental Screening Form (Table 1),
   b. Identification of Mitigation Plan (Table 2)
   c. Environmental Monitoring and Evaluation Tracking Table (Table 3).
4. Photos, Maps, Level of Effort

GUIDELINES FOR IMPLEMENTING PARTNERS ON THE USAID LAC ENVIRONMENTAL MITIGATION PLAN (EMP)

Appendix 1:

I. Coversheet for ENVIRONMENTAL MITIGATION PLAN (EMP)

USAID MISSION SO # and Title: __________________________________________________________________

Title of IP Activity: ______________________________________________________________________

IP Name: ________________________________________________________________________________

Funding Period: FY_____ - FY_____ 

Resource Levels (US$): __________________________________________________________________

Report Prepared by: Name: ___________________________________________________________________ Date: ____________

Date of Previous EMP: __________________________ (if any)

Status of Fulfilling Mitigation Measures and Monitoring:

_____ Initial EMP describing mitigation plan is attached (Yes or No).

_____ Annual EMR describing status of mitigation measures is established and attached (Yes or No).

_____ Certain mitigation conditions could not be satisfied and remedial action has been provided within a revised EMP (Yes or No).

USAID Mission Clearance of EMP:

Contracting Officer’s Technical Representative: ___________ Date: ____________

Mission Environmental Officer: ____________________________________________________________________ Date: ____________

( )

Regional Environmental Advisor: __________________________________________________________________ Date: ____________

( )
II. Environmental Mitigation Plan & Report Narrative

Note: summary instructions are in italics and not to be included in the report, but rather should be filled out with project specific information.

Note: Outline to be included in the report is in bold.

1. Background, Rationale and Outputs/Results Expected:

Summarize and cross-reference proposal if this review is contained therein.

2. Activity Description:

Succinctly describe location, site details, surroundings (include a map, even a sketch map). Provide both quantitative and qualitative information about actions needed during construction, how intervention will operate and any ancillary development activities that are required to build or operate the primary activity (e.g., road to a facility, need to quarry or excavate borrow material, need to lay utility pipes to connect with energy, water source or disposal point or any other activity needed to accomplish the primary one but in a different location). If various alternatives have been considered and rejected because the proposed activity is considered more environmentally sound, explain these. Describe how gender considerations have been incorporated into the activity. How will gender relations affect the achievements of activity results? How will the activity results affect the relative status of men and women?

3. Environmental Baseline:

Describe affected environment, including essential baseline information available for all affected locations and sites, both primary and ancillary activities. Describe how the activity will involve men and women who directly affect the environment. Methodologies for data collection and analysis for gender-sensitive implementation and monitoring of activities are encouraged.

4. Evaluation of Environmental Impact Potential of Activities (Table 2):

As a component of the Identification of Mitigation Plan (Appendix 1, Table 2), describe impacts that could occur before implementation starts, during implementation, as well as any problems that might arise with restoring or reusing the site, if the facility or activity were completed or ceased to exist. Explain direct, indirect, induced and cumulative effects on various components of the environment (e.g., air, water, geology, soils, vegetation, wildlife, aquatic
resources, historic, archaeological or other cultural resources, people and their communities, land use, traffic, waste disposal, water supply, energy, etc.). Indicate positive impacts and how the natural resources base will be sustainably improved.

For example, any activity that increases human presence in an area, even temporarily, will increase noise, waste, and the potential for hunting, timbering, etc.

Evaluating the environmental impact potential of activities must include gender-sensitive indicators and sex-disaggregated data when the activities or their anticipated results involve or affect women and men differently; and if so, this difference should be an important factor in managing for sustainable activity impact.

5. Environmental Mitigation Actions (Tables 2 & 3):

For the Initial EMP: List the mitigation measures in the “Identification of Mitigation Plan” (Table 2) and describe monitoring of these mitigation measures in the “Environmental Monitoring and Evaluation Tracking Table” (Table 3).

For the EMR: Describe status of complying with the conditions. Examples of the types of questions an IP should answer to describe "status" follow.

1) What mitigation measures have been put in place? How is the success of mitigation measures being determined? If they are not working, why not? What adjustments need to be made?

2) What is being monitored, how frequently and where, and what action is being taken (as needed) based on the results of the monitoring? In some situations, an IP will need to note that the monitoring program is still being developed with intent to satisfy the conditions. Alternatively, it could happen that the conditions cannot be achieved because of various impediments.

6. GENDER

Integrating gender considerations into all stages of planning, programming, and implementation of development assistance is not only a priority for USAID, but also an essential part of effective and sustainable development. The Automated Directive System (ADS) 201 sets out specific requirements to help ensure that appropriate consideration is given to gender as a factor in development planning at the Assistance Objective and the Intermediate Results level of Assistance Objectives all the way down to the activity level. This programming policy includes clear guidance on the procedures for gender integration where determined to be appropriate. In this regard, gender issues must be addressed in procurement documents and evaluation
criteria. Gender equality is a USG-wide priority, and USAID has and will continue to take a lead role in that effort. For example, USAID/Environmental Protection Program monitors how men and women will be involved in the process of improving country-specific environmental impact assessment procedures. The Program is documenting gender participation in all of its activities. Whenever possible, gender based differences in roles, attitudes and concerns should also be documented.
III-A. Environmental Screening Form (Table 1)

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<th>Name of Activity:</th>
<th>Column A</th>
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### IMPACT ON NATURAL RESOURCES & COMMUNITIES

1. Will the project involve construction of any type of structure (building, check dam, walls, etc)?
2. Will the project involve the construction or repair of roads or trails?
3. Will the project involve the use, involve plans to use or training in the use of any chemical compounds such as pesticides (including neem), herbicides, paint, varnish, lead-based products, etc?
4. Involve the construction of repair of irrigation systems?
5. Involve the construction or repair of fish ponds?
6. Involve the disposal of used engine oil?
7. Will the project involve implementation of timber management or extraction of forest products?
8. Are there any potentially sensitive terrestrial or aquatic areas near the project site, including protected areas?
9. Does the activity impact upon wildlife, forest resources, or wetlands?
10. Will the activities proposed generate airborne gases, liquids, or solids (i.e. discharge pollutants)
11. Will the waste generated during or after the project impact on neighboring surface or ground water?
12. Will the activity result in clearing of forest cover?
13. Will the activity contribute to erosion?
14. Is the activity incompatible with existing land use in the vicinity?
15. Will the activity contribute to displace housing?
16. Will the activity affect unique geologic or physical features?
17. Will the activity contribute to change in the amount of surface water in any body?
18. Will the activity deal with mangroves and coral reefs?
19. Will the activity expose people or property to flooding?
20. Will the activity contribute substantial reduction in the amount of ground water otherwise available for public water supplies?
21. Will the activity create objectionable odors?
22. Will the activity violate air standard?

### ENVIRONMENT & HEALTH

23. Will the project activities create conditions encouraging an increase of waterborne diseases or populations of disease carrying vectors or other health or safety hazards?
24. For road rehabilitation as well as water and sanitation grants, has a maintenance plan been submitted?
25. Will the activity generate hazards or barriers for pedestrians, motorists or persons with disabilities?
26. Will the activity increase existing noise levels?
27. Will the project involve the disposal of syringes, gauzes, gloves and other biohazard medical waste?
28 Is the activity incompatible with existing land use?

LOCAL PLANNING PERMITS

29 Does the activity e.g. infrastructure improvements, require local planning permission(s)?
   N/A  N/A

30 Does the activity meet the national building code (e.g. infrastructure improvements)?
   N/A  N/A

GENDER

31 Do men and women benefit disproportionately or are involved unequally in the project's activities?

32 Are there factors that prevent women's participation in the project?

RECOMMENDED ACTION (Check Appropriate Action):

(a) The project has no potential for substantial adverse environmental effects. No further environmental review is required (Categorical Exclusion). No EMP required.

(b) The project has potential for minimal to medium adverse environmental effects, but mitigable environmental effects. Measures to mitigate environmental effects will be incorporated (Negative Determination with Conditions). EMP Required.

(c) The project has potentially substantial or significant adverse environmental effects, but requires more analysis to form a conclusion. An Environmental Assessment will be prepared (Positive Determination). No EMP required.

(d) The project has potentially substantial adverse environmental effects, and revisions to the project design or location or the development of new alternatives is required (Deferral).

(e) The project has substantial and unmitigable adverse environmental effects. Mitigation is insufficient to eliminate these effects and alternatives are not feasible. The project is not recommended for funding.

1 Construction projects need to be reviewed for scale, planned use, building code needs and maintenance. Some small construction projects, such as building an entrance sign to a park, may require simple mitigations whereas larger buildings will require more extensive review and monitoring.

2 New construction of roads and trails will require a full environmental assessment of the planned construction, i.e. a Positive Determination.

3 The planned involvement of pesticides will trigger the need to develop a Supplemental Initial Environmental Examination that meets USAID pesticide procedures (Pesticide Evaluation Report and Safer Use Action Plan or "PERSUAP") for the project.

4 Any activities that involve harvesting trees or converting forests will require a full environmental assessment of the activity (i.e. Positive Determination).

5 A positive response to gender questions require follow up only when there are other positive responses on questions 1 – 30, and an EMP is developed.
III-B. Identification of Mitigation Plan (Table 2)

Enter the Question/Row # of the potential negative impacts with check marks in Column A (Table 1) and complete table below for mitigation measures to reduce or eliminate the issue. In the Sub-Activity or Component Column, list the main actions to be implemented. Under each action, list the tasks (Steps) that are needed to implement this action.

<table>
<thead>
<tr>
<th>#</th>
<th>Sub-activity or component</th>
<th>Description of Impact</th>
<th>Mitigation Measures</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Component 1</td>
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<tr>
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<td>Step 1</td>
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<td>Step 3</td>
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<tr>
<td>2</td>
<td>Component 2</td>
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<td>Step 1</td>
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<td>Step 3</td>
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</table>

* provide overview of measures used from the USAID LAC Environmental Guidelines or other pertinent guidelines, details on exact monitoring plan are illustrated in Table 3, Environmental Monitoring and Evaluation Tracking Table.
III-C. Environmental Monitoring and Evaluation Tracking Table (Table 3).

<table>
<thead>
<tr>
<th>#</th>
<th>Description of Mitigation Measure</th>
<th>Responsible Party</th>
<th>Monitoring Methods</th>
<th>Estimated Cost</th>
<th>Results</th>
<th>Recommended Adjustments</th>
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<tr>
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<td></td>
<td>Dates Monitored</td>
<td>Problems Encountered</td>
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